

Message

From: Marsh, Karen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=03408BEA5D5B4030BE80FA390ED47026-MARSH, KARE]
Sent: 8/24/2018 1:00:04 PM
To: Nathaniel Robinson [nathanielr@goldllc.org]; Hambrick, Amy [Hambrick.Amy@epa.gov]; Thompson, Lisa [Thompson.Lisa@epa.gov]
Subject: RE: Subpart KKK Question

Hi Nathaniel,

Subpart KKK applies to natural gas processing plants and requires the more traditional LDAR monitoring approach (Method 21 at specified frequencies based on equipment type). There is an alternative work practice available at 40 CFR 60.18(g), (h), and (i) that sources subject to Subpart KKK can opt to use. In that alternative, the process unit(s) can be monitored using OGI at a monthly, semiquarterly, or bimonthly frequency. Additionally, you must perform Method 21 monitoring on the entire process unit at least once annually. For example, you would use OGI for the process unit(s) 5 times per year, and monitor with Method 21 1 time per year. I'm happy to explain this alternative in more detail if you would like.

Thanks,
Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Nathaniel Robinson [mailto:nathanielr@goldllc.org]
Sent: Thursday, August 23, 2018 7:00 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>; Thompson, Lisa <Thompson.Lisa@epa.gov>
Subject: Subpart KKK Question

Good afternoon,

I have one more question that I was hoping you could answer for me. We have a location that complies with Subpart KKK and have previously done the monitoring using Method 21. Is using a FLIR OGI camera an acceptable alternative to Method 21 for KKK monitoring? We appreciate your time and assistance in complying with EPA regulations.

Thank you,

Nathaniel

From: Marsh, Karen <Marsh.Karen@epa.gov>
Sent: Tuesday, August 21, 2018 9:23 AM
To: Nathaniel Robinson; Hambrick, Amy
Subject: RE: OOOOa Annual Report Question

Hi Nathaniel,

Sorry for the delay in a response. The information I'll be sharing here is for guidance purposes only, so if you needed a firm applicability determination, you should reach out to the regional office for that.

In general, NSPS OOOOa requires semiannual monitoring at well sites, unless the well site contains only one or more wellheads (no other processing equipment). The drilling of a new well or fracturing of an existing well triggers a modification and triggers the applicability of the fugitive emissions monitoring program for the collection of fugitive emissions components located at the well site (as specified in 60.5365a(i)(3)). By definition, a well site is one or more surface sites that are constructed for the drilling and subsequent operation of any oil well, natural gas well, or injection well. A well site also includes separate tank batteries that receive crude oil, condensate, intermediate hydrocarbon liquids, or produced water from wells not located at the well site.

For your example, the new well is drilled at a wellhead only well site and sends gas to a centralized tank battery. In this instance, the new well has triggered the modification, thus subjecting the centralized tank battery to fugitive emissions monitoring. However, the wellhead only well site would not be subject to monitoring because of the exemption in 60.5365a(i)(2).

I hope this helps.

Karen

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From: Nathaniel Robinson [<mailto:nathanielr@goldllc.org>]
Sent: Tuesday, August 21, 2018 10:22 AM
To: Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: Re: OOOOa Annual Report Question

Good morning Amy and Karen,

I just wanted to check in with you again to see if you were able to find any answers or if you had any additional questions for us. We appreciate your time and looks forward to hearing from you soon.

Thank you,

Nathaniel

From: Nathaniel Robinson
Sent: Tuesday, August 14, 2018 11:58 AM
To: Hambrick, Amy
Cc: Marsh, Karen
Subject: Re: OOOOa Annual Report Question

Hi Amy and Karen,

Thank you for taking the time to look into this for us. To answer your questions:

1. The well heads are pumping units with all of the process equipment located at the tank battery.
2. We are doing fugitive monitoring at one of the tank batteries (per Colorado Reg 7) and the other we are not.

Thank you again for your time. We look forward to hearing from you.

Thank you,
Nathaniel

From: Hambrick, Amy
Sent: Tuesday, August 14, 9:37 AM
Subject: RE: OOOOa Annual Report Question
To: Nathaniel Robinson
Cc: Marsh, Karen

Hi Nathaniel-

I was talking with our fugitives expert today (Karen Marsh, cc'd) and we have a draft answer for you but thought we better get clarification on two questions. We want to make sure we are providing you with the most accurate information.

Questions:

What else is at the well site (e.g., well head only vs. well head and other equipment)? Are you already doing fugitives monitoring at the tank battery?

Once we hear back from you, Karen Marsh (cc'd) will be the one who will likely respond.

Kind regards,

Amy

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Thompson, Lisa
Sent: Monday, August 13, 2018 8:55 AM
To: Nathaniel Robinson <nathanielr@goldllc.org>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: RE: OOOOa Annual Report Question

Hi Nathaniel –

I'm referring your question to Amy Hambrick, copied here, who is the Oil and Gas sector lead here in OAQPS.

Thanks,
Lisa

From: Nathaniel Robinson [<mailto:nathanielr@goldllc.org>]
Sent: Thursday, August 9, 2018 9:04 PM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>
Subject: OOOOa Annual Report Question

Hi Lisa,
If I have a newly drilled well (2018) that is not located on, but goes to an existing tank battery, do I need to do LDAR inspections on the well semi-annually per Subpart OOOOa?
Thank you,
Nathaniel Robinson
Vice President
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